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14 REVEAL FROM THE CENTER FOR  
15 INVESTIGATIVE REPORTING;  
16 MATT SMITH; and AMY WALTERS

17 IN THE UNITED STATES DISTRICT COURT

18 THE NORTHERN DISTRICT OF CALIFORNIA

19 PLANET AID INC., and LISBETH THOMSEN,

Case No. 17-cv-03695-MMC

20 Plaintiffs,

**DECLARATION OF ENOCK  
CHIKAONDA**

21 v.

22 REVEAL, CENTER FOR INVESTIGATIVE  
23 REPORTING, MATT SMITH, and AMY  
24 WALTERS,

Judge: Hon. Maxine Chesney  
Date: November 9, 2018  
Time: 9:00 a.m.  
Location: San Francisco Courthouse  
**Courtroom 7 – 19<sup>th</sup> Floor**  
450 Golden Gate Avenue  
San Francisco, CA 94102

Defendant.

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**DECLARATION OF ENOCK CHIKAONDA**

1 I, Enock Chikaonda, declare:

2       1. I am the former vice-chairperson of the DAPP Malawi Farmers' Club in Njuli  
3 village, Malawi. I currently reside in Njuli, Malawi. I make this declaration from personal  
4 knowledge, and am competent to testify to the statements in this declaration. My native language  
5 is Malawian Chichewa. The contents of this declaration have been read to me in Malawian  
6 Chichewa and I understand it will be translated into English.

7       2. I first spoke to Matt Smith in September, 2015, after I spoke with Kandani Ngwira.  
8 Matt was accompanied by Kandani and a woman named Amy Walters. I did not understand what  
9 Matt said to me in English, because I do not speak or understand English. Kandani told me that  
10 Matt was from America, worked for The Center for Investigative Reporting/Reveal, that Amy was  
11 recording us, and that they wanted to tell my story to the whole world. Matt asked questions,  
12 which Kandani translated for me.

13       3. I told Matt and Kandani many facts during our conversations; it is too much  
14 information to fully recount here. In particular, I told Matt and Kandani the information in  
15 paragraphs 5-10, below. I know this information to be true based on my own personal knowledge.  
16 I conveyed this truthful information to Matt and Kandani, and answered Matt and Kandani's  
17 questions about this information.

18       4. I was never offered or promised, and I never received, any money, gifts, or  
19 anything of value from Matt Smith, Amy Walters, or Kandani Ngwira.

20       5. A few years ago, individuals who identified themselves as employees of DAPP  
21 Malawi came to my village. They told me they were setting up a program called "Farmers' Club"  
22 to help the local farmers. One of the Farmers' Clubs was located in my village. In explaining  
23 what the "Farmers' Clubs" involved, DAPP Malawi promised that they would provide the  
24 members of the Farmers' Club (me and other villagers) with agricultural inputs such as seeds,  
25 fertilizer, livestock, and rope-powered water pumps.

26       6. I became the vice-chairperson of the Farmers' Club in my village.

1           7. DAPP Malawi, however, did not provide enough seeds or fertilizer to improve our  
2 farming yields. Instead, DAPP Malawi created “demonstration” plots that were only temporary  
3 using farmers that were already doing well including myself. There is very little that I benefited  
4 from DAPP Malawi Farmers’ Club. After DAPP Malawi ended the Farmers’ Clubs in my village,  
5 there is no evidence of agricultural improvement.

6        8.      DAPP Malawi did not provide enough livestock they promised. For a club of about  
7      50 members, DAPP Malawi provided only five goats and five pigs. I do not know what happened  
8      to the pigs. I cannot say that I know of many people in Njuli Village who now have pigs from the  
9      DAPP Malawi Farmers' Club. I got one of the five goats. I am the only one remaining with goats  
10     currently from that project in this village.

11        9. DAPP Malawi did not provide enough rope pumps for the club members. In  
12 particular, DAPP Malawi provided about seven rope pumps from the 25 they had promised. I got  
13 one rope pump which was placed on my farm. I live in a village of about 300 families. About half  
14 of the village used to fetch water for domestic use from my rope pump until recently when two  
15 boreholes were installed in the village. None of the other villagers received rope pumps, except for  
16 the Chief, myself and two others.

17        10. DAPP Malawi did not provide any maintenance for the rope pumps, so I have kept  
18 it running with my own materials.

19 This declaration was executed on the **27th** day of **December 2017**, at **Njuli, Chiradzulu**  
20 **District**, Malawi. I declare under penalty of perjury under the laws of the United States and the  
21 State of California that the foregoing is true and correct.

E. Chikonda

Enock Chikaonda

## BEFORE ME:

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**NOTARY PUBLIC**

Allan Hans Muhome (LLB Hons Mw)  
Legal Practitioner  
Notary Public  
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